

**REMARKS/ARGUMENTS**

Claims 20, 22-31 and 33-37 are pending in this application. Claims 24, 33 and 37 have been withdrawn from consideration by the Examiner. As noted in earlier replies, upon allowance of generic independent claim 20, withdrawn claims 24, 33 and 37 should be rejoined and considered.

By this Amendment, claims 20 and 28 are amended, and claim 21 is cancelled without prejudice or disclaimer. Support for the claims can be found throughout the specification, including the original claims and the drawings. Withdrawal of the rejections in view of the above amendments and the following remarks is respectfully requested.

**I. Rejection Under 35 U.S.C. §112, First Paragraph**

The Office Action rejects claim 20 under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement. The rejection is respectfully traversed.

The Office Action asserts that the recitation in claim 20 regarding a strength of the front cover being less than a strength of the back cover is not adequately supported in the specification. Applicant respectfully disagrees. The Examiner's attention is first drawn to paragraph 18 of the present application. Paragraph 18 states, with respect to the related art monitor shown in Figure 1, that a relatively heavy frame 3 and LCD module are coupled to a front cover 5 having relatively low strength. The relatively low strength of the front cover 5

causes the front cover 5 to be deformed during the course of assembly. Thus, paragraph 18 establishes that the front cover has a relatively low strength.

The Examiner's attention is next drawn to paragraph 51 of the present application (referred to in the Office Action). Paragraph 51 states that by fixing a fixing frame 20 and an LCD module 30 to a back cover 10 that forms a supporting structure for the monitor, the higher strength of that cover 10 provides a more reliable support and coupling for the fixing frame 20 and LCD module 30.

It is respectfully submitted that the recitation regarding the relative strength of the front cover and the back cover in independent claim 20 would be well understood by one of ordinary skill in the art, especially when taken in light of the accompanying description in the present application, and in particular, paragraphs 18 and 51 of the specification. Accordingly, it is respectfully submitted that claim 20 meets the requirements of 35 U.S.C. §112, first paragraph, and thus the rejection should be withdrawn.

## **II. Rejections Under 35 U.S.C. §103(a)**

The Office Action rejects claims 20, 21, 25-28 and 33 under 35 U.S.C. § 103(a) over U.S. Patent No. 5,570,267 to Ma (hereinafter "Ma") in view of Figure 1 of the present application. Claim 21 has been cancelled. The rejection, in so far as it applies to claims 20, 25-28 and 33, is respectfully traversed.

Independent claim 20 is directed to a method for fixing a flat display panel in a monitor. The method includes aligning a display panel and a fixing frame with a back cover, and

thereafter simultaneously coupling the aligned display panel and fixing frame to the back cover using a fastener, the fastener being inserted from a forward side of the display panel and extending therethrough and into the back cover. The method also includes thereafter coupling a front cover to the back cover having the display panel and fixing frame coupled thereto, wherein a strength of the front cover is less than a strength of the back cover. As acknowledged in the Office Action, Ma neither discloses nor suggests each of the features of independent claim 20. Further, Figure 1 of the present application fails to overcome the deficiencies of Ma.

Ma discloses in Figure 1 (referred to in the Office Action) a prior art LCD module including a display unit A, a bottom cover B and a top cover C. In assembling the LCD module, the display unit A is first fastened to the bottom cover B using a first set of screws, and then the top cover C is fastened to the bottom cover B by a second set of screws.

It would be well understood by one of ordinary skill in the art that the notebook computer, LCD module, and associated assembly system disclosed by Ma is not properly compared to the claimed method for fixing a flat panel display as recited in independent claim 20. More specifically, as previously set forth, the claimed back cover is more robust than the front cover to support proper, reliable component mounting and a support structure or base. This higher strength back cover is not necessary in the notebook computer application disclosed by Ma, and would add undue cost and complexity to such a design.

Additionally, Ma discloses that the top cover C is fastened to the bottom cover B by a second set of screws. It is unlikely that one of ordinary skill in the art would employ such a

fastening mechanism through the front cover recited in independent claim 20, due at least in part to the relative weakness of the claimed front cover. It is respectfully submitted that one of ordinary skill in the art would not apply the method recited in independent claim 20 to a notebook computer such as that disclosed by Ma, nor would one of ordinary skill in the art be motivated to make such a modification to the system and method disclosed by Ma.

However, even if one were to improperly compare the notebook computer, LCD module, and associated assembly system disclosed by Ma with the method for fixing a flat panel display in a monitor as recited in independent claim 20, Ma still neither discloses nor suggests any type of fixing frame which is aligned with the display unit A, nor that the display unit A and such a fixing frame are simultaneously coupled to the bottom cover B using a fastener that is inserted from a forward side of the display unit A and extending therethrough into the bottom cover B. Rather, the second set of screws extends through the top cover C into the bottom cover B. Thus, Ma neither discloses nor suggests the aligning and coupling steps recited in independent claim 20.

Further, Ma is silent as to the relative strength of the bottom cover B and the top cover C. The Office Action asserts that, due to the opening in the top cover C, a strength of the top cover C is necessarily less than a strength of the bottom cover B. Applicant respectfully disagrees. As set forth above, it would be well understood by one of ordinary skill in the art that in order to support the insertion of the second set of screws therethrough and the subsequent load of the components coupled thereto, the top cover C must be at least equally as strong as the

bottom cover B. Thus, Ma neither discloses nor suggests that a strength of the top (front) cover C is less than a strength of the bottom (back) cover B, as recited in independent claim 20.

The Office Action asserts that it would have been obvious to rearrange an insertion direction of the screws. Applicant respectfully disagrees. Ma specifically teaches that screws should be accessible for removal of the covers for maintenance and repair. Such a reversal of direction would require that the top cover C first be removed before a space between a rear of the display unit A and an inside of the bottom cover B could be accessed, due to the location of the heads of the screws. Thus, such a modification would add undue complexity in the finished product.

The Office Action asserts that an alleged outer frame which surrounds the display unit A shown in Figure 1 of Ma may be compared to the recited fixing frame. However, Ma makes no such specific disclosure of an outer frame in the written description of Figure 1, nor of how this alleged frame is coupled to the display unit A. Ma also fails to disclose or suggest that this alleged frame and display unit are simultaneously coupled to the bottom cover B, as recited in independent claim 20. Rather, as would be well understood by one of ordinary skill in the art, Ma's notebook computer uses a lead wire D to connect the display module A and the main body E, thus eliminating any need for a fixing frame having, for example, wiring connections and the like, to support the display module A. In contrast, a general monitor such as, for example, a monitor as recited in independent claim 20, typically does not rely on a main body for support,

and thus a power circuit board and display driving circuit may be supported by a component of the display itself, such as, for example, a fixing frame.

Additionally, Ma discloses that the structure shown in Figure 1 requires complicated mounting processes and makes necessary repair work difficult. Thus, it is respectfully submitted that Ma teaches away from use of the structure shown in Figure 1. Accordingly, based on this disclosure, one of ordinary skill in the art would not have looked to Figure 1 of Ma in developing this type of structure for assembly of a LCD module.

Further, Figure 1 of the present application is merely cited in this rejection to teach the use of bosses, and thus fails to overcome the above stated deficiencies of Ma.

Accordingly, it is respectfully submitted that independent claim 20 is allowable over the applied combination, and thus the rejection of independent claim 20 under 35 U.S.C. § 103(a) over Ma and Figure 1 of the present application should be withdrawn. Dependent claims 25-28 and 33 are allowable at least for the reasons set forth above with respect to independent claim 20 and from which they depend, as well as for their features.

The Office Action rejects claims 20, 21 and 25-31 under 35 U.S.C. § 103(a) over Figure 1 and pages 2-4 of the present application. Claim 21 has been cancelled. The rejection, in so far as it applies to claims 20, 25-31, is respectfully traversed.

The features recited in independent claim 20 are set forth above. Figure 1 of the present application neither discloses nor suggests such features, or the claimed combination of features.

Figure 1 of the present application discloses a flat display monitor 1 with an LCD module 4 positioned between front and back covers 5 and 2, respectively. During assembly, the LCD module 4 is fixed to a fixing frame 3 by a first screw group 6. A second screw group 7 is used to couple this assembly to the front cover 5, and then a third screw group 8 is used to couple the back cover 2 to the front cover 5. When so coupled, the majority of the weight of the LCD module 4 is borne by the relatively weak front cover 5. Neither Figure 1 of the present application nor the accompanying description thereof discloses or suggests aligning a display panel and a fixing frame with a back cover, or simultaneously coupling the aligned display panel and fixing frame to the back cover using a fastener that is inserted from a forward side of the display panel and extending into the back cover, as recited in independent claim 20.

Further, it is respectfully submitted that such a fixing method would not have been obvious to one of ordinary skill in the art. Among the numerous deficiencies set forth in the present application with respect to assembly of the LCD module 4 shown in Figure 1 (see, for example, paragraphs 15-19 of the present application) is the complexity and related cost of assembly when numerous screw groups are required, and the added complexity and costs associated with a front cover 5 which can adequately support the LCD module 4.

The Office Action asserts that the claimed method is a mere reversal of the essential working parts of the LCD module 4 shown in Figure 1. However, aligning and coupling the LCD module 4 and fixing frame 3 to the back cover 2 rather than to the front cover 5 requires a complete redesign of the back cover 2 to receive the appropriate coupling and fastening

elements. Additionally, these coupling and fastening elements would have to be appropriately redesigned (such as, for example, those elements which allow the monitor 1 to be positioned on a stand or fixed to a mounting surface). Accordingly, it is respectfully submitted that the method recited in independent claim 20 requires more than mere reversal of the essential working parts of the LCD module 4 shown in Figure 1 of the present application.

Accordingly, it is respectfully submitted that independent claim 20 is allowable over Figure 1 of the present application and the accompanying written description thereof, and thus the rejection of independent claim 20 under 35 U.S.C. § 103(a) over Figure 1 and pages 2-4 of the present application should be withdrawn. Dependent claims 25-31 are allowable at least for the reasons set forth above with respect to independent claim 20, from which they depend, as well as for their added features.

The Office Action rejects claims 23 and 34-36 under 35 U.S.C. § 103(a) over Ma in view of Figure 1 of the present application, and further in view of U.S. Patent No. 5,905,550 to Ohgami et al. (hereinafter "Ohgami"). The rejection is respectfully traversed.

Dependent claims 23 and 34-36 are allowable over Ma and Figure 1 of the present application at least for the reasons set forth above with respect to independent claim 20, from which they depend, as well as for their added features. Further, Ohgami is merely cited as allegedly teaching the use of a hook and a hook receiving portion, and thus fails to overcome the deficiencies of Ma and Figure 1 of the present application. Accordingly, it is respectfully submitted that claims 23 and 34-36 are allowable over the applied



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combination, and thus the rejections of claims 23 and 34-36 under 35 U.S.C. § 103(a) over Ma, Figure 1 of the present application and Ohgami should be withdrawn.

### **III. Conclusion**

In view of the foregoing amendments and remarks, it is respectfully submitted that the application is in condition for allowance. If the Examiner believes that any additional changes would place the application in better condition for allowance, the Examiner is invited to contact the undersigned **Joanna K. Mason**, at the telephone number listed below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this, concurrent and future replies, including extension of time fees, to Deposit Account 16-0607 and please credit any excess fees to such deposit account.

Respectfully submitted,  
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